

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA                     )  
   )  
   )                     No. 5:18-cr-61-1-2  
   )  
   )  
SAM BENT and                                     )  
DJENEBA BENT,                                  )  
Defendants.   )

**DEFENDANT'S MOTION TO EXTEND MOTIONS FILING DEADLINE**

NOW COMES the Defendant, Sam Bent, by and through his attorney, Stephanie M. Greenlees, Esq., and hereby moves this Honorable Court for a sixty (60) day extension motions filing deadline in the above-captioned criminal proceeding. As grounds for this motion, Defendant states as follows:

The current motions filing deadline in this matter is set for September 5, 2018. As of the date of this motion, Defendant has not obtained a complete of the discovery from the Government in this matter. Defendant's undersigned counsel has notified the Government of the incomplete discovery and requested it be produced. For that reason, an additional period of sixty (60) days is necessary so Defendant may obtain a complete copy of the discovery and to prepare and file motions. A sixty (60) day extension is further necessary to allow Defendant sufficient time to review the discovery which is complex and substantially electronic given the involvement of digital currency and dark web marketplace transactions in the subject charges.

Defendant agrees that the deadline for filing motions should be extended and he recognizes that any additional time granted will be excluded from computation under the Speedy Trial Act. 18 U.S.C. §3161(h)(1)(D)(excluding time resulting from filing of motions). The ends

of justice will be served by granting this extension as it will provide Defendant the “reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. §3161(h)(8)(A).

Undersigned counsel has communicated with counsel for the Government, Assistant United States Attorney Michael Drescher, and counsel for Defendant Djeneba Bent, Assistant Federal Defender David McColgin, regarding this request for an extension of the motions filing deadline. AUSA Drescher and AFPD McColgin have no objection.

WHEREFORE, Defendant respectfully requests that the Court grant this motion to extend the motions filing deadline by sixty (60) days and the attached proposed Order.

DATED at Burlington, Vermont this 31<sup>st</sup> day of August, 2018.

Respectfully Submitted By,

SAM BENT  
By Counsel

KAPLAN AND KAPLAN

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